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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 AMERICAN CIVIL LIBERTIES
13 UNION FOUNDATION OF
14 SOUTHERN CALIFORNIA,
15 *Plaintiff,*

16 v.
17 UNITED STATES IMMIGRATION
18 AND CUSTOMS ENFORCEMENT,
et al.,

19 *Defendants.*

20 Case No. 2:22-CV-04760-SHK

21 **JOINT STIPULATION TO SET
BRIEFING SCHEDULE FOR
MOTION TO ENFORCE JULY 8,
2024 ORDER ON MOTION FOR
SUMMARY JUDGMENT (ECF NO.
87)**

22 Honorable Shashi H. Kewalramani
23 United States Magistrate Judge

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27 *ACLU of Southern California v. U.S. ICE, et al.,*
Case No. 2:22-CV-04760-SHK
28 JOINT STIPULATION TO SET BRIEFING SCHEDULE

1 IT IS HEREBY STIPULATED, by and between Plaintiff American Civil
2 Liberties Union Foundation of Southern California (“ACLU SoCal”) and Defendant
3 U.S. Department of Homeland Security (“DHS”), subject to an order of the court, as
4 follows:

5 1. On May 27, 2025, the parties appeared before the Court for a status
6 conference. The Court ordered the parties to submit either a stipulated
7 schedule or competing schedules for a noticed motion through which
8 Plaintiff would seek the order that it had sought at the scheduling
9 conference and the parties’ related joint filing.¹

10 2. The parties met and conferred and agreed to submit the following joint
11 briefing and hearing schedule. The parties request that the Court order this
12 briefing and hearing schedule.

13 • Plaintiff files its motion to enforce the Court’s July 8, 2024 summary
14 judgment order by May 30, 2025;

15 • Defendant DHS files its opposition to this motion by June 6, 2025;

16 • Plaintiff files its reply in support of this motion by June 13, 2025;

17 • The Court holds a hearing on this motion via Zoom on June 18, 2025 at
18 10:00 a.m. (or as soon thereafter as is convenient).

19
20 **IT IS SO STIPULATED.**

21 Respectfully submitted this 29th day of May, 2025.

22
23 _____
24 ¹ Local Rule 7-3 would ordinarily require the parties to have met and conferred by
25 May 23, 2025. The parties have exchanged several emails and portions of a joint
26 status report, ECF No. 122, and have appeared for a status conference; however, they
27 did not have a telephone meet and confer by May 23, 2025. Plaintiff and Defendant
DHS therefore propose a briefing schedule that, with the Court’s leave, waives the
Local Rule 7-3 requirement that the parties meet and confer seven days before
Plaintiff files its motion.

1 /S/ Laboni A. Hoq

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21 /S/ Joseph W. Tursi

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24 *Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories
25 listed, and on whose behalf the filing is submitted, concur in the filing's content and
26 have authorized the filing.

27

28 *ACLU of Southern California v. U.S. ICE, et al.*, Case No. 2:22-CV-04760-SHK
JOINT STIPULATION TO SET BRIEFING SCHEDULE